

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**DANIEL B. O'KEEFE,  
CELESTE A. FOSTER O'KEEFE,  
AND THE DANCEL GROUP, INC.**

**PLAINTIFFS**

**VS.**

**CAUSE NO. 1:08cv600-HSO-LRA**

**STATE FARM FIRE & CASUALTY  
COMPANY and MARSHALL J. ELEUTERIUS and  
JOHN AND JANE DOES A, B, C, D, E, F, G and H**

**DEFENDANTS**

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**MOTION TO FILE ATTACHMENTS TO EXHIBITS OF  
PLAINTIFFS' [273] RESPONSE IN OPPOSITION TO MOTION [255] [256] FOR  
PROTECTIVE ORDER TO LIMIT DISCOVERY *UNDER SEAL***

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COME NOW THE PLAINTIFFS, by and through undersigned counsel, and file their *Motion to File Attachments to Exhibits of Plaintiffs' [273] Response in Opposition to Motion [255] [256] for Protective Order to Limit Discovery Under Seal*, and in support thereof would show the Court as follows:

Plaintiffs request that the Attachments to Exhibits 2, 3 and 4 be filed under seal as said documents that form the Attachments to Exhibits 2, 3 and 4 contain privileged information pursuant to protective order and cannot be electronically filed with the Court. Plaintiffs request to file said attachments under seal is out of an abundance of caution. However, if the Court does not find that said documents should be filed under seal in this cause, Plaintiffs will make diligent efforts to redact any potential privileged information. Plaintiffs intend to provide hard

copies of the attachments to Exhibits 2, 3 and 4 under seal in lieu of electronic filing.

WHEREFORE PREMISES CONSIDERED, Plaintiffs respectfully requests the court to grant Plaintiffs' *Motion to File Attachments to Exhibits 2, 3 and 4 of Plaintiffs' [273] Response in Opposition to Motion [255] [256] for Protective Order to Limit Discovery under seal*, and any additional relief in favor of the Plaintiffs deemed appropriate by this Honorable Court.

RESPECTFULLY SUBMITTED, this the 12<sup>th</sup> day of October, 2009.

DANIEL AND CELESTE O'KEEFE, PLAINTIFFS

By: /s/ Christopher C. Van Cleave  
Christopher C. Van Cleave (MSB #10796)

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**CERTIFICATE OF SERVICE**

I, undersigned counsel of record, hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the EFC system which sent notification of such filing to the following:

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**Attorneys for State Farm**

This the 12<sup>th</sup> day of October, 2009.

By: /s/ Christopher C. Van Cleave  
Christopher C. Van Cleave (MSB #10796)